

IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

FILED

2020 FEB 20 PM 12:51

In re: ERYN JENKINS

U.S. BANKRUPTCY COURT
Jen

CHAP 13

case no. 19-18006-ELF

ANSWER BY DEBTOR OPPOSING MOTION BY CHAP. 13 TRUSTEE

1. **Denied.** Notice that the Chap. 13 Trustee does not Object to the Plan itself, nor did any Creditor make a Proof of Claim. The Chap. 13 Plan calls for "zero payments" and to impose a constructive trust swapping all debt for equity. In the alternative, the Bankruptcy Code allows for secured claims to be treated outside the Plan, subject to Proof of Claim. Either way, there is no money in it for the Trustee, who otherwise refused to make an Objection or require his kickback.
2. **Denied.** There are no "delays" here at all, and the "zero dollars Plan" calls¹ for a zero dollars payment, subject to any Proof of Claim. The case must continue until all Creditors have made an appearance, and the matter brought up to Appeal over any disputes or controversies about the length and breadth of the creditor-debtor relationship. The Motion here is bad faith and must be dismissed with prejudice. However, we are very willing to pay any bribes requested by Chap. 13 Trustee SCOTT F. WATERMAN, NOBLE ESQUIRE.

Service List

1st class mail:

Scott F. Waterman Atty.

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Reading, Pa. 19606

date: 2/16/2020

ERYN JENKINS

¹ *ibid*